

EXHIBIT

A



INDICTMENT

Fulton County Superior Court

****FILED** ET**

Date: 8/29/2023

Che Alexander, Clerk of Court

Clerk No. 23SC189192

FULTON COUNTY SUPERIOR COURT

JULY 2023 TERM

STATE OF GEORGIA

v.

Beamon, Jack Morgan

Biederman, Max Jacob

Bilodeau, Timothy E.

Bogush, Emma Katherine

Carlisle, Andrew

Carroll, Francis M.

Chaoui, Amin Jalal

Courtemanche, Brooke Elaine

Dorsey, Colin Patrick

DuPuis, Julia Caroline

Ebaugh, Ariel Caitlin

Ellis, Lillian Pearl

Feola, Madeleine

Ferguson, Ivan James

Flagg, Phillip Allen

Gates, Maggie June

Geier, Nadja
Grim, Priscilla Christine
Gupta, Sonali
Harper, Luke Edward
Hertel, Serena Abby
Hoitt-Lange, Marianna Elizabeth
Jurgens, Thomas Webb
Kass, Hannah Margaret
Kautz, Marlon Scott
King, Ayla Elegia
Kloth, Katie Marie
Kodat, Madeleine Gunther
Larmey, Zoe C.
Lee, Ana Gypsy
LeNy, Dimitri Roger
Liberto, Spencer Bernard
Luini, Mattia
Macar, Matthew Ernest
MacLean, Adele Garrett
Marsicano, James Lee
Martin, Grace Taylor
Meissner, Kayley Cheryl
Murphy, Emily
Murphy, Timothy A.R.
Norman, Tyler John
Novak, Leif Kingfisher Nicholas
Nottingham, Ehret William

Olson, Nicholas Dean
Papali, Alexis Achilles
Parsons, Geoffrey
Patterson, Savannah D.
Pipes, Kamryn Durel
Puertas, Victor Enrique
Reynolds, Christopher
Robert-Paul, Fredrique
Robinson, Arieon T.
Shen, Teresa Yue
Skapyak, Abigail Elizabeth
Tennenbaum, Caroline Hart
Tilbury, Geneva Rose
Vassail, Abeeku Osei
Voiselle, Leonard Zen AKA Leonardo Zen
Ward, Samuel Clemens
Warren, William Budden
Wasalewski, Sarah

Filed in office:

_____, Grand Jury Bailiff

Date: August 29 2023

_____, Clerk, S. C.

True BILL



Foreman



CHRISTOPHER M. CARR, Attorney General

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COUNT 1 - RACKETEERING

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse **JACK MORGAN BEAMON, MAX JACOB BIEDERMAN, TIMOTHY E. BILODEAU, EMMA KATHERINE BOGUSH, ANDREW CARLISLE, FRANCIS M. CARROLL, AMIN JALAL CHAOUI, BROOKE ELAINE COURTEMANCHE A.K.A. BROOKE ELAINE COURTEMANCHE, COLIN PATRICK DORSEY, JULIA CAROLINE DUPUIS, ARIEL CAITLIN EBAUGH, LILLIAN PEARL ELLIS, MADELEINE FEOLA, IVAN JAMES FERGUSON, PHILLIP ALLEN FLAGG, MAGGIE JUNE GATES, NADJA GEIER, PRISCILLA CHRISTINE GRIM, SONALI GUPTA, LUKE EDWARD HARPER, SERENA ABBY HERTEL, MARIANNA ELIZABETH HOITT-LANGE, THOMAS WEBB JURGENS, HANNAH MARGARET KASS, MARLON SCOTT KAUTZ, AYL A ELEGIA KING, KATIE MARIE KLOTH, MADELEINE GUNTHER KODAT, ZOE C. LARMEY, ANA GYPSY LEE, DIMITRI ROGER LENY, SPENCER BERNARD LIBERTO, MATTIA LUINI, MATTHEW ERNEST MACAR, ADELE GARRETT MACLEAN, JAMES LEE MARSICANO, GRACE TAYLOR MARTIN, KAYLEY CHERYL MEISSNER, EMILY MURPHY, TIMOTHY A.R. MURPHY, TYLER JOHN NORMAN, EHRET WILLIAM NOTTINGHAM, LEIF KINGFISHER NICHOLAS NOVAK, NICHOLAS DEAN OLSON, ALEXIS ACHILLES PAPALI, GEOFFREY PARSONS, SAVANNAH D. PATTERSON, KAMRYN DUREL PIPES, VICTOR ENRIQUE PUERTAS, CHRISTOPHER REYNOLDS, FREDRIQUE ROBERT-PAUL, ARIEON T. ROBINSON, TERESA YUE SHEN, ABAGAIL ELIZABETH SKAPYAK, CAROLINE HART TENNENBAUM, GENEVA ROSE TILBURY, ABEEKU OSEI VASSAIL, LEONARD ZEN VOISELLE AKA LEONARDO ZEN VOISELLE, SAMUEL CLEMENS WARD, WILLIAM BUDDEN WARREN, AND SARAH**

WASALEWSKI (hereafter referred to collectively as **“THE ACCUSED” in Count 1**), with the offense of **VIOLATION OF THE GEORGIA RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(c)**, for the said accused, individually and as persons concerned in the commission of a crime, and together with unindicted co-conspirators, in the State of Georgia and the County of Fulton, on or between May 25, 2020 and August 25, 2023, while associated with an enterprise, did unlawfully conspire and endeavor to conduct and participate in, directly and indirectly, such enterprise through a pattern of racketeering activity in violation of **O.C.G.A. § 16-14-4(b)** as more particularly described below and incorporated by reference as if fully set forth herein; contrary to the laws of the State of Georgia, the good order, peace, and dignity thereof;

PART I

THE ENTERPRISE

a. Introduction

The purpose of Defend the Atlanta Forest is to occupy of parts or all of 381 forested acres in DeKalb County, Georgia that is owned by Atlanta Police Foundation and leased by the City of Atlanta for the purpose of preventing the construction of the Atlanta Public Safety Training Center. Each individual charged in this indictment knowing joined the conspiracy in an attempt to prevent the training center from being built. That conspiracy contained a common purpose to commit two or more acts of racketeering activity in Fulton County, Georgia, elsewhere in the State of Georgia, and in other states.

b. Defend the Atlanta Forest

Defend the Atlanta Forest is a self-identified coalition and enterprise of militant anarchists, eco-activists, and community organizers. Based in Atlanta, this anarchist, anti-police, and environmental activism organization coordinates, advertises, and conducts “direct action” designed to prevent the construction of the Atlanta Police Public Safety Training Center and Shadowbox Studios (previously known as Blackhall Studios) and promote anarchist ideas. This self-proclaimed “direct action” has included vandalizing of private property, arson, destruction of government property, attacks on utility workers, attacks on law enforcement, attacks on private citizens, and gun violence. The purpose of these actions is to prevent the construction of the Atlanta Police Public Safety Training Center and a movie studio, all while promoting virulent anarchist ideals.

c. Anarchy Background of Defend the Atlanta Forest

Anarchy is a philosophy that is opposed to forms of authority or hierarchy. Beginnings of anarchist ideals date back centuries, though usage of the term “anarchy” did not exist until the 1800s. Over time, various philosophical forms of anarchy have emerged. Numerous anarchist philosophies exist, though anarchists are not required to subscribe to one particular belief of anarchy. Rather, the notion of anarchy, being grounded in an anti-authority mindset, primarily targets government because it views government as unnecessarily oppressive. Instead of relying on a modicum of government structure, anarchy relies on human association instead of government to fulfill all human needs. Some of the major ideas that anarchists promote include collectivism, mutualism/mutual aid, and social solidarity, and these same ideas are frequently seen in the Defend the Atlanta Forest movement.

Collectivism is the idea that individual needs are subordinate to the good of the whole society. That is, decisions are made based upon what is best for the group and not necessarily what is best for individuals. In embracing collectivism, individuals are expected to sacrifice personal income, personal liberty, or personal property if it benefits society as a whole. The decision of whether an individual should sacrifice their own individual needs is not made by the individual. Rather, in a true collectivist society, the society as a whole decides whether the individual must forfeit their own needs or property if it is deemed to benefit the society. Nevertheless, in an ideal collectivist society, individuals already make the decision to donate to the collective without prompting from others.

Mutual Aid is a term popularized by anarchists to describe individuals who exchange goods and services to assist other individuals in society without government intervention. Closely related to collectivism, mutual aid is not a new term, nor is it limited to anarchy. However, the major factor in anarchist mutual aid is the absence of government and the absence of hierarchy. Indeed, an anarchist belief relies on the notion that once government is abolished, individuals will rely on mutual aid to exist. In doing so, anarchists believe that individuals will work together and voluntarily contribute their own resources to insure that each individual has its own needs met.

Social solidarity is another term that is embraced by anarchists that is tied closely to mutual aid and collectivism. Social solidarity is the idea that individuals can live together without government and can provide for each other. The notion of social solidarity relies heavily on the idea of human altruism; that is, individuals will voluntarily offer goods, services, and resources without anything compelling it. Anarchists often shorten the term “social solidarity” simply into the term “solidarity,” and it is frequently woven into the speeches, statements, and

writings of anarchists. In addition to the term “solidarity,” and other anarchist terms, anarchists often weave the term “mutual aid” and “collective” into their jargon and writings.

Violence is part of the anarchism in some anarchist beliefs. Viewing their own violent acts as political violence, violent anarchists attempt to frame the government as violent oppressionists, thereby justifying the anarchists’ own violence. Indeed, the belief is that the government is engaging in a form of violence by denying individuals basic needs through capitalism, government action, and law enforcement by police. Anarchists often point to law enforcement as one of the chief violent actors, and they accuse the government of using law enforcement to oppress societal change, and they view the structure of government as inherently oppressive and violent. As a result, violent anarchists often engage in violent activity towards law enforcement, and it is justified because of the anarchist belief that the ends justify the anarchist means. A local anarchist supporting the Stop Cop City movement recently wrote as such:

The movement’s militant direct action, land occupation, and sabotage of construction machinery have not only kept the struggle alive, but shifted the Overton window when it comes to how even nonprofits are willing to engage the struggle. When asked about the sabotage of construction and police machinery, the referendum campaign—notably, headed by nonprofits and electoral organizers—has continuously reiterated its support for a diversity of tactics, in a stark departure from many nonprofits’ more risk-averse approach to political action. Through a combination of tactics, the Stop Cop City has built a united front against Cop City that is willing to fight by any means necessary.

Just as with tactics that directly engage the system, much of the militant direct action has also heightened contradictions and exposed hypocrisies, thrusting fundamental questions into public consciousness: Are we more concerned about the “violence” of destroying construction machinery and police property, or about the violence of capitalist exploitation, environmental devastation, and police murder? What do we do when it’s liberal Democrats, rather than Republicans, who are leading the efforts to destroy an urban forest, suppress residents’ right to vote, and expand the police state? Do we truly believe that Cop City is a matter of life and death, and, if we do, what are we willing to do to stop it?

As noted by the anarchist above, the militant anarchists engage in violence to bring attention to their own political goals and their perceived government violence. But political violence is not simply a philosophy; Defend the Atlanta Forest has put the philosophy into action. Indeed, in one example, a known Defend the Atlanta Forest arsonist was recorded complaining that there were not enough violent members in protests against the Training Center.

The spread of anarchist ideas is conducted through word of mouth, internet, and written form. As with any political ideology, the promotion of anarchist ideas exists and is spread on the internet. Additionally, as noted later in this indictment, Defend the Atlanta Forest anarchists target and recruit individuals with a certain personal profile. Once these individuals have been recruited, members of Defend the Atlanta Forest also promote anarchist ideas through written documents and word of mouth. A leading anarchist member of Defend the Atlanta Forest wrote that they recruit and “radicalize Liberals by providing subversive narrative w/o encouraging state solutions.” Other written documents, known colloquially as “zines,” promote anarchist ideas. Anarchist documents located with the Defend the Atlanta Forest group decry capitalism in any

form, condemn government, and cast all law enforcement as violent murderers. The documents subsequently often conclude that the remedy for the perceived “repression” conducted by government is to do acts of violence. These anarchist “zines” have been located throughout the forested areas occupied by the so-called “Forest Defenders” in addition to other locations where anarchists are known to be.

In addition to handing out documents, individuals who join Defend the Atlanta Forest are offered financial, personal, and emotional support to remain loyal to the movement. Indeed, the “Forest Defenders,” are provided with monetary, emotional, and personal support during their occupation of the forest, during their incarceration, and after their incarceration. The discussions of support often refer to providing “mutual aid” and “solidarity.” In addition to providing monetary and emotional support, there is preparation for arrest. Most “Forest Defenders” are aware that they are preparing to break the law, and this is demonstrated by premeditation of attacks. Preparation efforts including efforts to avoid detection, plans to disguise their identity, and preparation in case of arrest despite efforts to avoid capture. Preparation includes, but is not limited to, disguising their face, bringing changes of clothing to blend in after the crime is committed, hiding in crowds, and using technology avoidance devices such as Faraday bags and burner phones, and memorizing or writing the Atlanta Solidarity Fund’s phone number on their body in case of arrest. Shortly afterward, in an effort to de-legitimize the facts as relayed by law enforcement and to keep the loyalty of the Forest Defendants, members of Defend the Atlanta Forest often contact news media and flood social media with claims that their unlawful actions are protected by the First Amendment.

After arrest, emotional and personal support is offered through letter writing campaigns and encouragements of “solidarity.” In doing so, this offers emotional support and maintains the

loyalty of the accused with the Defend the Atlanta Forest movement. On the other hand, an accused that demonstrates potential disloyalty to Defend the Atlanta Forest risk losing all financial, personal, and emotional support that is offered. One example included a threat to refuse to post bail for an incarcerated Defend the Atlanta Forest arrestee unless he complied with Defend the Atlanta Forest's demands.

These anarchist ideals and actions undergird the occupation of the forested area that will be the site of the Atlanta Public Training Center.

d. Beginnings of the Defend the Atlanta Forest Enterprise

The beginnings of the anarchist Defend the Atlanta Forest movement formed in 2020 following the high-profile killing of George Floyd by Minneapolis Police Officers. In the weeks following Floyd's murder, Atlanta resident Rayshard Brooks was shot and killed by Atlanta police in a Wendy's parking lot after Brooks violently concussed a police officer, stole the officer's Taser, and pointed the Taser at another police officer while fleeing. While the Brooks shooting was justified, it caused anti-police violence tensions to boil over, and it further flamed political tensions surrounding policing. As a result, nationwide demonstrations and protests increased, including in the Atlanta area. Nearly all of the demonstrations centered around a message of anti-police violence that arose from a spate of high-profile nationwide police shootings.

While most demonstrations landed within Constitutional protections, not all demonstrations were peaceful. In the aftermath of Floyd's murder and shortly after Brooks' shooting death, a 24-hour "autonomous zone" was formed in the area surrounding the Wendy's

where Brooks was killed. The Wendy's was burned to the ground by protestors, and the zone began to be occupied individuals who were heavily armed with rifles, shotguns, and handguns. Within the area of the autonomous zone was a significant population of armed Blood street gang members. As part of this autonomous zone, busy public roads were blocked by these armed individuals and gang members, effectively creating a "Checkpoint Charlie" in downtown Atlanta. On July 4, 2020, the zone reached its pinnacle of violence: A MARTA bus had guns drawn on it as it pulled up to the autonomous zone. Several hours later, when a couple drove up to a barricade, a shotgun was pointed at them and they were forced to turn around. While they were turning around, a rifle was pointed at them by another zone occupant to ensure that they left the area. Minutes later, an innocent 8-year old would be shot and killed by armed gang members of the autonomous zone. A car occupied by 8-year-old Secoria Turner and her mother bypassed an autonomous zone checkpoint, and gang members fired on the car, killing Secoria. In the 23 days that the autonomous zone existed in Atlanta, the occupants promoted violence centered around an anti-police sentiment.

Meanwhile, anti-government anarchists in Atlanta recognized an opportunity to rally against the law enforcement. On July 5, 2020, the night after Secoria Turner's shooting death and during evening demonstrations that protested police violence, masked demonstrators attacked the Georgia Department of Public Safety headquarters. Department of Public Safety headquarters houses the Georgia State Patrol. The masked demonstrators echoed a familiar theme: an extreme anti-police message. DPS headquarters was vandalized using thrown rocks and other objects. The attack did not stop with vandalizing, however, as it escalated into a known anarchist hurling a Molotov cocktail through a window. The ensuing fire resulted in two employees suffering injuries and the building catching fire. The demonstrations and protests

eventually ended, but an undercurrent of threatening, violent anti-police sentiment persisted with some individuals in the Atlanta area, including those that make up Defend the Atlanta Forest, and it remains as one of Defend the Atlanta Forest's core driving motives.

e. The Atlanta Police Public Safety Training Center

In April of 2021, Atlanta Mayor Keisha Lance Bottoms announced the lease of 381 acres in DeKalb County, Georgia from the Atlanta Police Foundation for the purpose of building a police training facility. On September 7, 2021, the Atlanta City Council approved the lease by a 10-4 vote during an open meeting and after public discussion. The land will be used for the development of an 85 acre police/fire training facility that would be built on part of the grounds. The purpose of the police training site is to better train police to deal with Atlanta's increase in violence while also training law enforcement in de-escalation techniques that avoid unnecessary violence. When completed, the site will be the largest and most advanced police training site in the United States.

f. Shadowbox Studios, DeKalb County, and the "Land Swap"

In addition to the land leased to the City of Atlanta, DeKalb County and Shadowbox Studios owned two other portions of the land at or near the forest. Shadowbox Studios is a film studio that serves as a location where films are created and produced. Shadowbox owns a successful studio across Constitution Road, just south of the forest that is occupied by Defend the Atlanta Forest, though it has not remained untouched by Defend the Atlanta Forest. Indeed, multiple instances of vandalism and arson by Defend the Atlanta Forest members have occurred against Shadowbox Studios. The Studio also owns undeveloped land inside and outside of the forest at issue. The location outside of the forest is adjacent to the Studio to the south with public plans to develop the land into an expansion of the studios. Though Defend the Atlanta

Forest members have not occupied the forest south of Shadowbox Studios, they have used outrage at the proposed development to recruit individuals to join the Defend the Atlanta Forest movement.

Shadowbox Studios used to own approximately 50 acres near Intrenchment Creek Park that straddled Bouldercrest Road and was broken into three smaller parcels. This was located within the area of the forest occupied by the Defend the Atlanta Forest members. At the same time, DeKalb County owned 40 acres of land in a single location with the southeast point at the intersection of Bouldercrest Road and Constitution Road. In February of 2021, by agreement of Shadowbox and DeKalb County, the parties conducted a “land swap” where the titles to the land was exchanged so that Shadowbox took possession of the 40 acres of land, and DeKalb County took possession of the 50 acres previously owned by Shadowbox. The purpose was so Shadowbox could expand its studio, and DeKalb County could have a better location to establish Michelle Obama Park for enjoyment of the public at large.

Given that both Shadowbox Studios and DeKalb County swapped the land in an effort to promote development, Defend the Atlanta Forest expressed further outrage. As stated by the group via social media, “We will not let our forest be destroyed for the convenience of politicians, Hollywood and the police. No cop city. No Hollywood dystopia. Only forest.” While Defend the Atlanta Forest has since expressed outrage at this development, the group did not begin its occupation of the land or campaign of property destruction and violence until the announcement of the Atlanta Public Safety Training Center. Once the announcement of the training center was announced, Defend the Atlanta Forest used the outrage stemming from the George Floyd murder and shooting of Rayshard Brooks to promote its anti-police, anti-government, and anti-development views. With this movement beginning to gain traction among

anti-police factions, Defend the Atlanta Forest quickly expanded its public sentiments to include objections to Shadowbox Studios and the development of Michelle Obama Park. This way, the group could recruit more members by expanding its message from a simple anti-police message to an anti-government message. Recruiting anti-police, anti-government, and anti-development people from around the country resulted in the Defend the Atlanta Forest group that exists today to conduct acts of violence, intimidation, and property destruction.

g. Defend the Atlanta Forest Overview

Defend the Atlanta Forest is an unofficial, Atlanta-based organization that frames itself as a broad, decentralized, autonomous movement that uses advocacy and direct action to stop the “forest [from being] bulldozed in favor of police and sold out to Hollywood.” Defend the Atlanta Forest does not recruit from a single location, nor do all Defend the Atlanta Forest members have a history of working together as a group in a single location. Nevertheless, the group shares a unified opposition to the construction of the Atlanta Police Department Training Facility, construction companies associated with the project, and companies associated with construction properties in the around surrounding the forest. As the group has grown and recruited, it has evolved into a broader anti-government, anti-police, and anti-corporate extremist organization.

Defend the Atlanta Forest is made up of three primary ideologies. The first ideology is an anti-law enforcement ideology that attempts to push a narrative that all police are violent, militant individuals that frequently use excessive force and violence against innocent citizens. The goal of this ideology is the elimination of police forces in their entirety. The second ideology is protection of the environment at all costs. This ideology promotes the belief that the environment has the same rights as humans, and therefore violence is acceptable to defend the environment. The Defend the Atlanta Forest organization has acknowledged that they embrace

this extremist ideology. This is demonstrated by the group's justification of shooting a Georgia State Trooper: "Tortuguita died trying to kill a cop in defense of the Weelaunee forest." The third ideology is an anarchist ideology. As a result of all three ideologies joining forces, the group has been able to quickly recruit nationwide support of extremists, including out-of-state extremists that have traveled to Georgia. Many of these extremists embrace violence and anarchy, and they use the forest as a guise for their violent agenda.

The United States Department of Homeland Security has classified the individuals as alleged Domestic Violent Extremists (DVE). In a bulletin posting, the Department of Homeland Security concluded that "alleged DVEs in Georgia have cited anarchist violent extremism, animal rights/environmental violent extremism, and anti-law enforcement sentiment to justify criminal activity in opposition to a planned public safety training facility in Atlanta. Criminal acts have included an alleged shooting and assaults targeting law enforcement and property damage targeting the facility, construction companies, and financial institutions for their perceived involvement with the planned facility."

Defend the Atlanta Forest frequently uses symbols associated with anarchist movements, to include but not limited to, the capital letter "A" surrounded by a circle, a raised clenched fist, Antifa flags and symbols associated with anti-fascist movements, graffiti which includes these symbols, as well as "Defend the Atlanta Forest," "Defend the Atlanta Forest," "Stop Cop City," "Kill Cops," "All Cops are Bastards" (ACAB), and "1312" – the numerical equivalent of ACAB. These are prevalent in the area surrounding Intrenchment Creek Park and the neighboring abandoned Old Atlanta Prison farm. Additional graffiti which encourages violence against law enforcement is visible throughout the Atlanta area, and it has appeared in other large cities across the country.

Historical anarchist and activist movements in the United States have included the creation of “autonomous zones” in which participants do not recognize the lawful authority of local, state, or federal government. Such examples include the 2020 movements in Portland, Oregon and Seattle, Washington, the latter known as the “Capitol Hill Autonomous Zone” (CHAZ) which received a high volume of national and international media attention. A second example is the previously mentioned autonomous zone in Atlanta during the George Floyd demonstrations. A sign reading “You are now leaving the U.S.A.” is frequently featured in social media posts and blogs about Defend the Atlanta Forest and exemplifies the underlying anti-government and anti-authority ideology of Defend the Atlanta Forest.

Defend the Atlanta Forest maintains a strong social media presence on Facebook, Instagram, Twitter, and various blogs, and has also worked with external entities to produce videos and podcast interviews. Many of these videos and recordings are available on open-source platforms, and contain discussions of “militant actors” and “direct action,” tactics, strategy, and structure for anti-authority movements. In one video, a black-clad Defend the Atlanta Forest participant refers to historical insurgents or violent guerilla movements such as the Mexican Zapatistas and Syrian Revolution as a reference point for strategy and to anchor smaller movements to larger revolutions. The black-clad Defend the Atlanta Forest participant states that “the fate of the Kurdish revolutionaries in Kobani and Sere Kanive, and all of these places, it was partially determined by the bloodbath in Damascus and Aleppo,” and “I think that with the current movement here, it’s clear to me that the fate of the South River, Weelaunee Forest will be determined in midtown Atlanta and it will be determined in Chicago and in New York and in Los Angeles and in Seattle.”

The same black-clad Defend the Atlanta Forest participant goes on to detail the role of sabotage and militant actors in the Defend the Atlanta Forest movement by referencing US

Department of Defense theory on the role of defense and offense. Specifically, that “the role of defense is to open the space for offense” and that,

“Defenders, of course, especially in an urban context, not only in an urban context, but a wooded urban context, will always have an inherent advantage, especially if they perceive their role as defensive and they’re able to engage really on their own terms. They’re just trying to open space for offense.”

The black-clad Defend the Atlanta Forest participant describes the Atlanta Police Foundation (APF) as a “consumer” in purchasing construction services from a general contractor, Brasfield & Gorrie. Brasfield & Gorrie is in charge of major Atlanta Police Foundation project components such as structural engineering, blueprint making, and zoning, and works with subcontractors to achieve these objectives. The Defend the Atlanta Forest strategy, drawing from The Art of War by Sun Tzu, is to attack the strategy and allies of your enemy in order to “separate the subcontractors from the contractor and the contractor from the APF.” The Defend the Atlanta Forest speaker specifically mentions Reeves Young, a subcontractor for Brasfield & Gorrie, and references attacks against construction equipment in Georgia, and other states, which include arson and vandalism, protest and vandalism events at Reeves Young facilities, and “action at the home of the CEO” – referring to an incident in which activists committed acts of vandalism and hung threatening banners at a private residence. The black-clad Defend the Atlanta Forest participant states that Reeves Young “ultimately did the right thing. You know, they moved their money elsewhere, because that’s part of how all of this is working.” The black-clad Defend the Atlanta Forest participant justifies the property destruction and violence by stating that it is not an “existential attack on the company” because these companies have various of contracts and make of money elsewhere, and:

“The idea is, if you deal with the APF, you’ll deal with us. For this one contract, people are coming to your house. For this one contract, people are visiting your church. For this

one contract, people are flooding your phone lines, people are sending you faxes, people are visiting your office. Some people are vandalising your stores, are burning your equipment, for the one contract.”

The Defend the Atlanta Forest participant also describes previous engagement with the City Council, and a canvassing campaign, and describes the escalation of Defend the Atlanta Forest activities as a “natural consequence” emerging as a result of frustration and the “intransigence and immovability of the electoral system, of the political system.” The participant further states that the movement “intends to win,” and that this is a struggle that extends beyond Atlanta to the entire country. Defend the Atlanta Forest, and the struggle, plays a larger role in the climate crisis in which a petroleum-based, global capitalist structure is propped up with tear gas and violence. To prevent this domination, Defend the Atlanta Forest is “going to have to get our hands dirty. We’re going to have to do this ourselves.”

Utilizing various social media platforms, Defend the Atlanta Forest regularly promotes “Week of Action” events, and later claims responsibility for vandalism or arson committed during these specified timeframes on different websites. The websites used to claim activity are often foreign-hosted, and Defend the Atlanta Forest participants often promote online security measures which disguise a user’s true identity, such as the use of Virtual Private Networks (VPN).

h. Defend the Atlanta Forest Funding

The group is supported by three individuals that live at 80 Mayson Ave. in Atlanta. The three individuals use 80 Mayson Ave. as a primary residence, and all three work to support Defend the Atlanta Forest. The first individual is named Marlon Scott Kautz. Kautz is a lifelong community activist that controls and operates the Network for Strong Communities in Atlanta, which is a non-profit registered as a 501(c)(3) and serves as partial financial backing for Defend

the Atlanta Forest. Kautz self-identifies as the Chief Financial Officer for the Network for Strong Communities. Also living at 80 Mayson Ave. is Adele MacLean, who assists Kautz in running the Network for Strong Communities and identifies as the Chief Executive Officer. The third resident of 80 Mayson Avenue is Savannah Patterson, who is the Secretary and Treasurer of Network for Strong Communities. The Network for Strong Communities also operates the Atlanta Solidarity Fund which identifies itself as “[providing] support for people who are arrested at protests, or otherwise prosecuted for their movement involvement.” These members facilitate finances to support the occupation of the forested area near Intrenchment Creek.

The Network for Strong Communities portrays itself as providing community support in five different areas. The five areas are food access, mutual aid, bail fund, police accountability, and leadership development. For food access, the Network for Strong Communities operates a group known as Food4Life. Food4Life purports to raise money to purchase and distribute food to areas and communities that are in need of food. For mutual aid, there is not a known separate established group for mutual aid. For police accountability, the Network for Strong Communities operates CopWatch which is a loosely affiliated group that brings attention to police misconduct. Finally, as for a bail fund, the Network for Strong Communities operates the Atlanta Solidarity Fund.

Notably, according to the website for the Network for Strong Communities, the Atlanta Solidarity Fund is not primarily designed as a bail fund to pay for bonds of indigent inmates that cannot afford bond. Rather, the Atlanta Solidarity Fund’s primary purpose is to “[provide] support for people who get arrested at protests, or otherwise prosecuted for their movement involvement.” A recent example includes posting a \$392,000 cash bond for a Defendant charged with Domestic Terrorism while indigent defendants remained incarcerated as pre-trial detainees.

This did not leave that bank account without funds, however; the Atlanta Solidarity Fund simply chooses to only bond out certain individuals with certain belief structures.

Marlon Kautz, Adele MacLean, and Savannah Patterson created the Forest Justice Defense Fund as an arm of the Network for Strong Communities in July of 2021, and they were the administrators of the Fund. This is the same month as the protests surrounding the shooting of Rayshard Brooks and at the height of protests against police violence. In piggybacking off the momentum of the protests, the Network for Strong Communities began co-mingling funds from its various causes and raising money to support the occupation of the forest where the Atlanta Public Safety Training Center would be built. As a result, good faith donors donated their own money to a certain charitable cause, and the money was spent on the occupation of the forest.

Since 2021, the Network for Strong Communities has operated bank accounts that support the occupation of Defend the Atlanta Forest and promote anarchist ideas. The various accounts are controlled by Kautz, MacLean, and Patterson, and money has been moved via various banks. At times, the various bank accounts supporting the occupation of the forest has had millions of dollars, though the number has dropped at times due to prolific spending by the Network for Strong Communities. Seed money for the Network for Strong Communities was received from a larger political organization, but the significant majority of the funds come from public donation and political donations. The Network for Strong Communities accomplished this fundraising by painting itself as legitimate, law-abiding social justice organization, and as a result, members of the public donated to the organization with the legitimate belief that their monies go to lawful purposes. In 2021 alone, the account received over 70,000 donations from the public. Some donations are very small, ranging from a few cents to a few dollars, and other donations are many thousands of dollars.

The Network for Strong Communities also raises money via Defend the Atlanta Forest websites. Website links exist in various internet forums and social media. Twitter, Instagram, and other social media accounts for Defend the Atlanta Forest have links to fundraising. Not only do these accounts promote the occupation of the disputed forest, but some of them celebrate and promote violence and property damage.

Monies of the Network for Strong Communities are directly used to support the Defend the Atlanta Forest members that occupy the forest near Intrenchment Creek. Indeed, the funds are used to support the operations of the self-titled "Forest Defenders" that are inside and outside of the forest. One of the ways that the Defend the Atlanta Forest members are financially supported in the forest is via reimbursement for costs submitted by "Forest Defenders." The reimbursement operates in the same way that a traditional business conducts reimbursement. First, the Forest Defender spends money on goods or services related to Defend the Atlanta Forest operations and retains a receipt. The receipt is submitted to a fund known as the "Forest Justice Defense Fund" along with a description of the expense, and the expense must be approved. The expense is reviewed by an administrator of the account and the expense is approved or denied. The three administrators of the account are Marlon Kautz, Adele MacLean, and Savannah Patterson. One example of an expense includes Kautz submitting a receipt for handheld radios so that Forest Defenders can communicate without using cellphones. Kautz submitted the receipt, approved his own submission, and he received reimbursement for that expense. Other examples include food, supplies, camping equipment, rope, climbing equipment, ammunition, gear, surveillance equipment, tools, building supplies, a drone, and other items used to continually occupy the forest.

The reimbursement program is operated on a public website known as The Open Collective. Advertising itself to mutual aid groups, community initiatives, and other non-corporate entities, the Open Collective is a website that allows the general public to see any transactions that are conducted by an entity. The Open Collective does not require public disclosure of the identities of the transacting parties, and individuals submitting transactions may remain anonymous through usernames. However, while the username can be anonymous, the account must be tied to a corporation that conducts financial transactions such as PayPal or Venmo. By tying itself to a company that conduct financial transactions, identities of some of the individuals occupying the forest and supporting the occupation were discovered.

The Open Collective is a platform for “fiscal hosts.” The website for the Open Collective describes a “fiscal host” as “an organization that welcomes others to operate through their structure, so projects can use the host. The host provides administrative services, oversight, and support.” In this instance, the Network for Strong Communities acted as the “fiscal host” for the Forest Justice Defense Fund. For the Forest Justice Defense Fund, Marlon Kautz, Adele MacLean, and Savannah Patterson were registered as administrators of the account. That is, they had the power to approve or reject payments and reimbursements. In attempting to disguise their identities, Kautz registered as “Mouse,” MacLean registered as “Earthworm,” and Patterson registered as “Spud.” Patterson would later change her user name to “Danny.” Over the course of the many months, Kautz, MacLean, and Patterson approved individual reimbursements to “Forest Defenders” to assist in the occupation of the disputed forest.

In May of 2023, Kautz, MacLean, and Patterson learned that the State was aware of the payments being made in support of the forest occupation. One day after the State publicly disclosed the investigation of the Open Collective transactions during a Court hearing, an attempt

was made to disconnect the Forest Justice Defense Fund from the Network for Strong Communities. Kautz, MacLean, and Patterson accomplished this by changing the “fiscal host” of the Forest Justice Defense Fund. The “fiscal host” of the Forest Justice Defense Fund was transferred from the Network for Strong Communities to a new fiscal host known as “Siskiyou Mutual Aid,” and control of the funds available to the Forest Justice Defense Fund was changed to Siskiyou Mutual Aid. The entirety of the amount totaled \$48,864.88, and control of all of these funds was moved away from the Network for Strong Communities.

The Forest Justice Defense Fund alone has disbursed approximately \$89,000 to the Defend the Atlanta Forest members, though this does not account for all monies that Defend the Atlanta Forest has used to support its operations. Defend the Atlanta Forest estimates that its annual budget from the Forest Justice Defense Fund alone is approximately \$100,000, and this is only one example of monies used to support Defend the Atlanta Forest.

i. Communication

Communication from the Defend the Atlanta Forest management is conducted in many ways. Indeed, communication among the Defend the Atlanta Forest members is often cloaked in secrecy using sophisticated technology aimed at preventing law enforcement from viewing their communication and preventing recovery of the information. Members often use the dark web via Tor, use end-to-end encrypted messaging app Signal or Telegram, or use hand-held radios such as walkie-talkies while in the forest. Additionally, Defend the Atlanta Forest uses websites to broadly instruct its members on where to go and what to do. The communication paints itself as a “call to action” so that its appearance is benign; nevertheless, Defend the Atlanta Forest members are aware of the purpose of these calls to action, and they include violence and

property damage. A final way that the Defend the Atlanta Forest members communicate is in person. A loose network of homes and buildings around the East Atlanta area serve as places where Defend the Atlanta Forest members can received “mutual aid” and remain “in solidarity” with other Defend the Atlanta Forest members.

j. Occupation Inside the Forest

The forested area occupied by the “Forest Defenders” is in the middle of the disputed property. Numerous tents and living supplies were found throughout the area when law enforcement has attempted to remove the individuals from the privately held property. While there is not one singular location where “Forest Defenders” live, an area existed for a period of time that the “Forest Defenders” called the Living Room. As its name implies, it is an area where “Forest Defenders” gathered as if living inside of a house. Numerous tents were located in the surrounding area where “Forest Defenders” would sleep and store personal effects. In addition to a so-called living room, the area had a rudimentary bathroom where a toilet seat was attached to four vertical plastic poles to emulate a very basic toilet. It sat above a crude hole in the ground so that a toilet user’s waste would fall into the hole. In themes consistent with anarchy and anti-police sentiment, a painted sign titled the bathroom and toilet as “9/11 Memorial.”

The “Forest Defenders” did not occupy the forest without protection, however. In approaching the occupied areas, law enforcement encountered dangerous, sharp traps designed to injure approaching individuals. Additionally, various ingredients for making Molotov cocktails were located in addition to a rudimentary pipe bomb that had not been completed. In one incident, a civilian metal scrapper was trapped and held at gunpoint by “Forest Defenders” and

forced to leave a forested area simply because entered the premises to collect scrap metal. Some “Forest Defenders also act as “scouts.” The “scouts” watch for law enforcement or any threat to their occupation of the forest, and intelligence is spread in end-to-end encrypted texts so that “Forest Defenders” can actively avoid or fight the pending threat.

k. Propaganda and Recruitment

Defend the Atlanta Forest uses websites, social media, and statements to traditional media to sow disinformation and propaganda to promote its extremist political agenda, legitimize its behavior, and recruit new members. This is a traditional activity of anarchist organizations. To assist its members in promoting disinformation, Defend the Atlanta Forest uses written anarchist pamphlets, booklets, and writings.

An extremist anarchist website known as the “Scenes Blog” raises money for the Network for Strong Communities and promotes violent anarchy. The Scenes Blog is a website that claims responsibility for violence and property damage done in furtherance of the movement to stop the building of the Training Center. The site advocates and calls for additional violence against government and corporations, encourages violence ahead of government meetings, posts personal information and photographs of law enforcement, court officials, and private citizens and calls upon anarchists to visit these individuals and engage in intimidation, property damage, and violence. The site is tied to the Defend the Atlanta Forest movement in many ways, including raising money for the Network for Strong Communities, acknowledging that it is based in Atlanta, and centering itself around the “Stop Cop City” movement. Most tellingly, in a posted extremist video, Defend the Atlanta Forest acknowledges that it operates the Scenes Blog.

Anarchist zines instruct its members on how to effectively promote its political messages while also promoting the false idea that the group is non-violent. These publications are used to teach and influence Defend the Atlanta Forest members and recruits on how to deal with the media to promote its political message. An example of one of the publications is “Talking to the Media: A Guide for Anarchists.” Telling its members to “have extremely low expectations” of the media, the zines paint the media as its enemy by writing that “you are a carnival freak for Homo Journalisticus,” and tells the reader that the media will immediately condescend to them. As such, the publications instruct the Defend the Atlanta Forest member how to manipulate the media to take up as much column space or television time as possible. Following these instructions, Defend the Atlanta Forest holds media-attended press conferences to control the story and promote their own narrative.

Anarchists publish their own zines and publish their own statements because they do not trust the media to carry their message. Defend the Atlanta Forest documentation recommended publishing zines and conducting publicity on their own because “the best advice is to trust a reporter about as far as you can throw them” because they view media “as lying scum, and it’s best to treat them as such.” This is why Defend the Atlanta Forest anarchists often publish their own documents or conduct their own press conferences instead of allowing the media to report the story.

One of the most common false narratives promoted by Defend the Atlanta Forest is that of police aggression. The purpose of this disinformation campaign is to turn public opinion against law enforcement, thus justifying their violence and destruction of property. On or about January 18, 2023, a Defend the Atlanta Forest member shot a Georgia State Trooper who was assisting in clearing the forest. Troopers returned fire, killing the suspect. Defend the Atlanta

Forest immediately began a propaganda campaign against police by claiming that Troopers shot the Defend the Atlanta Forest member first. Despite its efforts to sway public opinion with false information, evidence demonstrated that the Defend the Atlanta Forest member shot the trooper first, and a Scenes Blog posting even admitted that its member shot the trooper first:

“Tortugueta died trying to kill a cop in defense of the Weelaunee forest... We attack the same machines that threaten the forest in Atlanta and everything wild. FIRE TO THE EARTH DESTROYERS. Until every cop is dead and all they defend burnt to ashes.”

Defend the Atlanta Forest also operates a website located at defendtheatlantaforest.org where it posts press releases, misleading information, propaganda, and disinformation. Using this website, Defend the Atlanta Forest solicits donations to the Forest Justice Defense Fund. As previously noted, this fund directly supports the occupation of the forest. The website, however, does not acknowledge the violence and destruction that it supports, however. Instead, Defend the Atlanta Forest posits itself as an advocacy group with the goal of saving the forest. The site goes on to recruit civilians in support of Defend the Atlanta Forest, including inviting civilians to join the movement in person. Once a civilian joins Defend the Atlanta Forest in person, Defend the Atlanta Forest members use disinformation, incomplete information, and propaganda to try to successfully radicalize the civilian.

Defend the Atlanta Forest posts many of its invitations to join the movement on various social media outlets such as Twitter and Telegram. Knowing that their posts are followed and re-posted by other decentralized extremist groups, most prominently Antifa, many violent anarchists and extremists travel from out of state to join the Defend the Atlanta Forest movement. While these individuals may not share a pro-environment ideology, Defend the Atlanta Forest knowingly reaps the benefits of these violent non-Georgians by using violence,

threats, and property damage to intimidate businesses, government, and civilians, thus promoting the anarchy movement.

Defend the Atlanta Forest and its anarchists documented a general profile of the person that is desirable for the violent movement. A cautious approach is highly recommended, as it recommends that “how you approach potential accomplices needs to be done right.” When looking for recruits, the documentation insists “don’t work with people who are not committed to the cause. When the stakes are high – as it is with any illegal direct action – trust your gut. If you are uncomfortable with any cell member – don’t work with them. PERIOD.” The documentation further recommends not allowing trusted friends to “vouch” for others, imagining yourself as a cellmate with the recruit, and asking yourself whether your recruit would “break.”

The ideal violent anarchist recruit also has a particular mental state according to documentation located with Defend the Atlanta Forest supporters. The ideal person is “someone who has enough anger about the state of the world to compel them to act. But it must be someone who is not overly angry and has control of their emotions. Ideally the person will be enthusiastic but not reckless.” Additionally, they “want people who are moved by their emotions, not so much by an intellectual understanding of our crisis. They need to be committed.”

And in addition to a personal profile, the ideal Defend the Atlanta Forest recruit will not harm the overall movement by giving evidence to the government. The recruiter should make sure that “they all are ready to go to jail for 5 to 30 years or life, if the worst happens. All cell-mates should be able to discuss what would be the hardest thing for them to cope with should

that happen – i.e. supporting children, pressure from parents to capitulate, fear of being beaten in jail or whatever.”

PART II

The Defendants committed overt acts to effect the object of the conspiracy which include acts of racketeering activity as described below:

OVERT ACTS IN FURTHERANCE OF THE RACKETEERING CONSPIRACY

- (1) On or about July 5, 2020, **ANDREW CARLISLE** and **SONALI GUPTA** threw objects and a Molotov cocktail at the Georgia State Patrol headquarters. These are overt acts in furtherance of the conspiracy.
- (2) On or about October 28, 2020, **SAVANNAH PATTERSON** transferred \$100.00 to an unindicted co-conspirator, whose identity is known by the Grand Jury, for ammunition. This was an overt act in furtherance of the conspiracy.
- (3) On or about November 1, 2020, **SAVANNAH PATTERSON** did transfer \$80.00 to **MARLON KAUTZ** for radio communication devices. This was an overt act in furtherance of the conspiracy.
- (4) On or about November 6, 2020, **SAVANNAH PATTERSON** did transfer \$40.00 to **MARLON KAUTZ** for radio communication devices and camp fuel. This was an overt act in furtherance of the conspiracy.

(5) On May 20, 2021, **MARLON KAUTZ, ADELE MACLEAN, and SAVANNAH PATTERSON**, along with unindicted co-conspirators that are unknown to the Grand Jury, did publish a post on scenes.noblogs.org linking to a post on anarchistnews.org that threatens property damage if construction on Blackhall Studios, Michelle Obama Park, and the Atlanta Public Safety Training Facility is not halted, thereby knowingly using threats against construction officials with the intent to cause and induce the construction officials to withhold records, documents, and testimony in official proceedings. This was an overt act in furtherance of the conspiracy.

(6) On May 20, 2021, **MARLON KAUTZ, ADELE MACLEAN, and SAVANNAH PATTERSON**, along with unindicted co-conspirators that are unknown to the Grand Jury, did publish a post on scenes.noblogs.org claiming responsibility for property damage to a construction equipment at the proposed site of the Atlanta Public Safety Training Facility, and implying a threat of further property damage, thereby knowingly using threats against construction officials with the intent to cause and induce the construction officials to withhold records, documents, and testimony in official proceedings. This was an overt act in furtherance of the conspiracy.